



300 Cadman Plaza West, 12th Floor
Brooklyn, NY 11201
P: (718) 852-3710
F: (718) 852-3586
www.stollglickman.com

March 27, 2024

VIA ECF ONLY

United States Magistrate Judge Cheryl L. Pollak
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Courtroom 13B South
Brooklyn, N.Y. 11201-1804

Re: ***Kalief Williams v. The Russo's Payroll Group, Inc. et al.***
21-cv-02922-EK-CLP

Your Honor-

We represent Plaintiff in the above captioned matter. I write to request you include, in your decisions on the pending competing motions to conduct three other depositions, an order for the deposition of non-party witness Phillip Montante ("Montante"). We subpoenaed him for a deposition for March 5, 2024. Defense counsel then said they would represent him (he is the former General Manager of Russo's catering hall, the defendant employer in this case) and that they would "be moving for a protective order and will not be appearing for the March 5, 2024, deposition until the Court has reached a decision on Plaintiff's motion." They've not so moved.

Montante was the General Manager of Russo's catering hall during the events at issue in this case. When we deposed the person identified by our client and defendants Robbie Russo and (equivocally) Joe Vacca as the HR department head, she denied filling that role, and testified that Montante directed all the actions she appeared to have taken as an HR manager.

We hope with these depositions we can wrap up discovery and move this case to trial. Thank you for your consideration.

Sincerely Yours,

A handwritten signature in blue ink, appearing to read 'A. Stoll'.

Andrew B. Stoll